

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN

KHARI WHEELER, individually and on behalf of all  
others similarly situated,

**CLASS ACTION**

**Case No. 2:21-cv-10032-SFC-KGA**

*Plaintiff,*

**JURY TRIAL DEMANDED**

vs.

DETROIT CAREGIVERS CENTER  
ASSOCIATION, LLC D/B/A GREEN CROSS, a  
Michigan Limited Liability Company,

*Defendant.*

/

**NOTICE OF DISMISSAL WITH PREJUDICE**

Plaintiff, Khari Wheeler, pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i), does hereby dismiss this this action as follows:

1. All claims of the Plaintiff, Khari Wheeler, individually, are hereby dismissed with prejudice.
2. All claims of any unnamed member of the alleged class are hereby dismissed without prejudice.

Date: March 03, 2021

Respectfully Submitted,

**Shamis & Gentile, P.A.**

/s/ Andrew J. Shamis

Andrew J. Shamis, Esq.  
Florida Bar No. 101754  
ashamis@shamisgentile.com  
14 NE 1<sup>st</sup> Avenue, Suite 705  
Miami, FL 33132  
Telephone: 305-479-2299

*Counsel for Plaintiff and the Class*

**CERTIFICATE OF SERVICE**

I hereby certify that on March 03, 2021, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel identified below via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner.

Respectfully submitted,

**SHAMIS & GENTILE, P.A.**  
14 NE 1<sup>st</sup> Ave., Suite 705  
Miami, FL 33132  
Telephone (305) 479-2299  
Facsimile (786) 623-0915  
Email: [efilings@sflinjuryattorneys.com](mailto:efilings@sflinjuryattorneys.com)

By: /s/ Andrew J. Shamis  
Andrew J. Shamis, Esq.  
Florida Bar # 101754

*Counsel for Plaintiff and the Class*